

ORIGINAL

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IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CRIMINAL NO. 03-80810

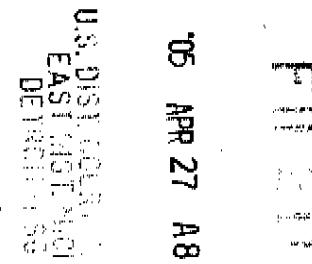
Plaintiff,

HONORABLE GERALD E. ROSEN

v.

D-1 AHMAD MUSA JEBRIL,  
D-2 MUSA ABDALLAH JEBRIL,

Defendants.

**GOVERNMENT'S SUPPLEMENTAL  
SENTENCING MEMORANDUM**

The United States of America, through its undersigned counsel, submitted a sentencing memorandum in this case several months ago, asking the Court to impose custodial sentences of 87 months upon Ahmad Jebril and 78 months upon Musa Jebril, as well as obligations for supervised release, forfeiture and restitution for each defendant. On April 22, 2005, Musa Jebril filed a sentencing memorandum, asking this Court to depart downward from the guidelines calculated by Probation in his presentence report. The government respectfully submits this memorandum and its attachments in response to that memorandum.

Defense counsel portrays Musa Jebril as a "man who has instilled positive values in his daughters and those with whom he has come in contact." It is difficult to respond to that description of Musa Jebril with equanimity. Musa Jebril supported his family by fraud for many years, and encouraged them (or perhaps required them) to participate in his fraud schemes. He never filed income taxes. His only son, Ahmad Jebril, was actively engaged in carrying out the fraud schemes with his father, systematically destroying their rental properties for the insurance proceeds, and bullying and threatening tenants in the process.

For example, the Court will recall the testimony of Dorothy Vermette, the 74-year-old lady who manages the apartment building at 1057 Victoria in Lincoln Park. Mrs. Vermette's disabled adult daughter lives with her. Their income is solely from Social Security. Mrs. Vermette mows the lawn, shovels snow, cleans the common areas, collects rents, cleans the apartments after tenants move out, and turns a blind eye when she sees Ahmad Jebril vandalizing apartments for the insurance money. In exchange for her services and her loyalty, the Jebrils give Mrs. Vermette *\$100 a month* against her rent; without that money, she and her daughter would have to move out of the apartment.

Similarly, the Court will recall the testimony of mail carrier Felix Ramirez, who testified he has delivered the mail to the Jebrils at 4637 Palmer (the home of Musa Jebril, his wife Subhieh Jebril, and Ahmad Jebril) and 4957 Rosalie (the home of Musa Jebril's daughter, Zeina Odeh) since 1989. Mr. Ramirez testified that shortly after he started delivering mail on that route, he realized he was delivering mail addressed to as many as 80 different names at those addresses.

Also, the Court will recall that the search of Zeina Odeh's house on Rosalie yielded significant evidence of the Jebrils' fraud, including a voter registration card in the name of Brahim Maach, one of Ahmad Jebril's aliases. Zeina Odeh, who is raising Musa Jebril's grandsons Musa and Haroun, cannot claim she has no knowledge of her father's fraud schemes.

The government seized a family photo album during the search of 4637 Palmer. The photos were not offered as evidence at the trial; however, they are still in the custody of the FBI and available for the Court to review. Defense counsel has seen the photos. The album includes photos of Ahmad Jebril as a teenager dressed as a *mujahid* or holy warrior; photos of very young children holding apparently real firearms, "playing" at holding each other hostage and aiming the

weapons at each other's heads. Musa Jebril and his wife Subhieh are in some of these photographs, condoning the behavior. A framed emblem of HAMAS, the Star of David pierced by a bloody fist brandishing an AK-47, was displayed in Musa Jebril's house; it was also seized by the agents executing a search warrant. As the patriarch of this family, Musa Jebril should not be commended and hailed as being a "good and loving father," or as "a role model within his community" with a "loving and tender heart."

Perhaps the most egregious statement defense counsel makes in his memorandum is that Musa Jebril "has helped to bridge the gap between Muslims and non-Muslims." Musa Jebril permitted his son, Ahmad Jebril, to run an anti-American radical Islamic website (AlSalafyoon.com) out of their home, and to teach classes in radical Salafism in their living room. The AlSalafyoon website contained a library of fanatically anti-American sermons by militant Islamic clerics, in English and in Arabic. From the website, Ahmad Jebril encouraged his students to spread Islam by the sword, to wage a holy war, to hate and kill non-Muslims (whom he called "kafers" or "kuffars"). After the search warrants were executed and the Jebrils had appeared in Court for arraignment, FrontPageMagazine.com published an article about the Jebrils and the website entitled "The Michigan Jihad" on October 23, 2003. The article contains excerpts of articles that appeared on the website; it is attached to this memorandum (Exhibit A). Other items that were downloaded from the website while it was operating are available to the Court; defense counsel saw them during discovery.

Finally, as the Court may recall, on November 13, 1995, a car bomb exploded in Riyadh, Saudi Arabia in the parking lot of a three-story building leased by the United States and used by U.S. military and civilian personnel. The blast killed six, including four Americans, and wounded at least 60 others. At 11:36 p.m. EST on November 14, 1995, a facsimile was received

by CNN praising the bombing; it was sent from a fax machine connected to a telephone line subscribed to by "Thomas Saad" at 4637 Palmer, Dearborn, Michigan. "Thomas Saad" is an alias used by Ahmad Jebril. The complete fax is attached (Exhibit B), as it was released by CNN; in part it states:

The bombing that happened in Riyadh that got the attention of the world is only the beginning of a new phase that the Saudi government will go through.

The first and main goal behind this first series of bombing is to kick the Jews, Christians and Infidels from the purified lands of the Arabian peninsula because it is the belief of every Muslim who bears witness that there is no God but One and Mohammed is his messenger. It is one of the last words of our profet [sic] said before his soul scperated [sic] his body when he said "Kick the Jews and Christians out of the Arabian peninsula. No two religions shall remain on the lands of the Arabian peninsula."

There will be a series of bombings that will follow no matter how many lives of ours are taken or how many bodies are in prison.

That is the precise reason why we chose the building we chose.

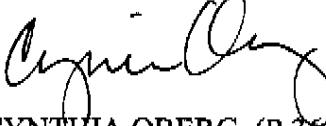
Ahmad Jebril was not prosecuted in connection with the Riyadh bombing, because there was no proof that the fax was not simply "puffing," no proof that he bore any actual responsibility for the deaths. However, the fact that Ahmad Jebril wanted to take credit for this deadly terrorist attack, and that Musa Jebril allowed his son to spew his radical brand of hatred out of the family home, can be taken into consideration by this Court in fashioning sentences that are both reasonable and appropriate for these two men.

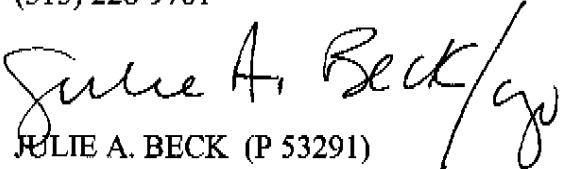
## CONCLUSION

A downward departure for either Musa Jebril or Ahmad Jebril based upon their "good citizenship" would clearly be unwarranted. If anything, the Jebrils' conduct should result in an upward departure from the guidelines or, at the very least, custodial sentences at the tops of their respective ranges.

Respectfully submitted,

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Dated: April 25, 2005

GOVERNMENT  
EXHIBIT

A

## The Michigan Jihad

By Evan Kohlmann

FrontPageMagazine.com | October 23, 2003

On September 9, FBI agents stormed into the Dearborn home of Ahmad Musa Jibril and his father Musa Abdallah Jibril, literally with guns drawn. The sudden raid stemmed from a 20-count federal indictment filed against the two men that alleged various criminal activities ranging from identity fraud to money laundering. Ahmad Jibril and his father are also reportedly being investigated for potential links to terrorist groups—and in a search warrant filed in U.S. District Court, the FBI listed several relevant items seized as evidence from their home, including a poster for the Palestinian terror organization Hamas. Agents additionally confiscated firearms, computers, cell phones, and blank passports; nevertheless, the two men were eventually released on a \$10,000 bond pending trial.

Considering the past activities of the Jibril family, the indictment and subsequent arrests come as no surprise. Over the last decade, the Jibrils have consistently endorsed violence and extremism in lectures to Muslim student groups here in the U.S. and likewise on their self-fashioned Internet mouthpiece, AlSalafyoon.com.

Ahmad Musa Jibril, who also goes by the nickname “Abu Khaled,” is a prominent local spokesman in Michigan for the radical Salafi Islamic trend—a fundamentalist ideology that is akin to Wahhabism for non-Saudis. Jibril was born in the United States, but spent part of his childhood in Saudi Arabia while his father was a student at the Islamic University of Medina. After returning to the United States and graduating from high school in 1989, Ahmad resumed his studies abroad in Saudi Arabia, eventually receiving a degree in Islamic *Sharia* (Religious Law). Currently in America, he “is actively engaged in holding [religious] classes,” at Wayne State University and the University of Michigan in Detroit, among others.[1]

As the result of his Saudi indoctrination, Ahmad Jibril became a disciple and strong supporter of militant Islamic clerics from the Arabian Gulf, including Shaykh Salman Al-Awdah, who Jibril has referred to as a “Great Imam & Scholar... [who] boldly confronted the American presence in [Saudi Arabia]... may Allah reward him the peak of heaven!” In an interview with journalist Peter Arnett, Osama Bin Laden lauded Al-Awdah as a personal hero and cited him as a direct inspiration for taking up “my duty of enjoining what is right and forbidding what is wrong.”[2]

Ahmad Jibril was in direct contact with Al-Awdah and forwarded the latter’s contact information over the Internet to other likeminded zealots inside America. Moreover, Jibril actively encouraged his Muslim colleagues to travel abroad to Yemen and join local madrassas (religious schools): “[T]hey are like universities[,] you can go to them and live there and study... I recommend anyone who can take some time out of his life to go there, so he will come back to us a fierce sword.”[3] American Taliban John Walker Lindh studied at exactly such an institution in Yemen—just prior to enlisting to fight against the U.S. in Afghanistan.

In the late 1990s, from their Michigan home, Ahmad Jibril and his father created a now-notorious Islamic Internet website known as AlSalafyoon.com. Among other items, the site featured a remarkable library of fanatic sermons, including speeches on the subject of *jihad* by Shaykh Abdullah Azzam (the late co-founder of Al-Qaeda and spiritual mentor to Osama Bin Laden) and by Abdelrahman Al-Dosari (a.k.a. Abu Abdel Aziz “Barbaros”, deemed by the U.S. government to be a senior member of Al-Qaeda).

Since its inception, AlSalafyoon.com has also offered web visitors a number of English-language

Islamic booklets, pamphlets, and poems dealing with the subject of *jihad*. One file, titled “*Jihad And Expedition in the Quran*,” bluntly urged sympathetic readers to “[w]age a holy war.”[4] Another posting, a poem labeled simply “*AL-JIHAD*,” cautioned:

“Yes, you’re neither Sheikh Osama [Bin Laden] nor Mullah Umar, but, don’t forget you’re a[n] Ummat of fighter Apostle. Why are you waiting go and thrust in the lines of enemies and have them crushed. Hit them on the neck and send them to hell... Give them a knife and a bulletful of gun... Fight, Fight & Fight, it must be our aim.”[5]

Ahmad Jibril frequently posted messages and updates – many of which were explicitly signed by Jibril himself—on Al-Salafyoon’s public forum under the Administrator login account “*Alsalaaf*.” In July 2000, an individual using the Administrator account (presumably Ahmad Jibril), posted a new discussion titled, “*WE MUST HATE KAFERS [infidels]!*”[6] The message read:

“You[r] heart must contain nothing but HATE to all kafers [infidels]...Not just plain hate it must be the peak of hate...Even if the kafer never did anything personal to us...even if he is a mere couch potato[sic] who reads the paper and sleeps and works, he is kafer alone makes him an enemy to us and we must hate him for that...The answer is clear yes Islam was spread by the sword.”[7]

Several months later, in response to the then-ongoing presidential election campaign, another message was posted to Al-Salafyoon’s forum using the same Administrator account, titled “*Those for Voting in USA have no honor!*” It admonished, “*JIHAD IN THE KORAN MEANS TO KILL THE KAFERS... WHEN JIHAD IS MENTIONED ALONE IN THE KORAN OR SUNNAH IT MEANS ONE HONORABLE THING - TO KILL THE KUFFAR.*”[8]

As federal investigators pore over what was seized in the Dearborn raid, they are almost certain to find more evidence of Ahmad Jibril’s fiery and unapologetic exhortations to violence. Yet, whether there was a relationship between the Jibril clan and designated foreign terrorist organizations (such as Al-Qaeda or Hamas) remains to be seen. In the meantime, as Jibril and his father remain free on bail, the danger remains that such fanatics will follow through on their persistent threats and “wage a holy war” against their “infidel” enemies—perhaps even directly in the heartland of America.

## ENDNOTES:

- [1] <http://alsalafyoon.com/AhmadJibril/aboutus.html>. May 2003.
- [2] “CNN/Time Impact: Holy Terror?” Transcript of Osama Bin Laden interview with Peter Arnett. CNN. March 1997.
- [3] Alsalaaf (Administrator). “Phone numbers of Salafy Scholars in YEMEN.” <http://pub4.ezboard.com/balsalafyoon29198>. September 14, 2000.
- [4] “*Jihad And Expedition (Kitab Al-Jihad Wal-Siyar)*.” <http://www.ummah.net/alsalafyoon/EnglishPosts/jihad1.html>. November 1999.
- [5] “*AL-JIHAD*.” <http://www.ummah.net/alsalafyoon/EnglishPosts/poem2.html>. November 1999.
- [6] Alsalaaf (Administrator). “*New Topic to Discuss: WE MUST HATE KAFERS!*” <http://pub4.ezboard.com/balsalafyoon29198>. July 7, 2000.
- [7] Alsalaaf (Administrator). “*New Topic to Discuss: WE MUST HATE KAFERS!*” <http://pub4.ezboard.com/balsalafyoon29198>. July 9, 2000.
- [8] Alsalaaf (Administrator). “*Those for Voting in USA Have no honor!*” <http://pub4.ezboard.com/balsalafyoon29198>. October 26, 2000.

A facsimile was received by the Cable News Network (CNN), Atlanta, Georgia, on 11/14/1995, at 11:36 p.m., on fax telephone number (404) 827-3134. The fax was three pages, did not have a cover sheet, and read, verbatim as follows:

"In the name of Allah, Islamic movement for change, from the lands where the sunshine of Islam arose to the world." The bombing that happened in Riyadh that got the attention of the world is only the beginning of a new phase that the Saudi government will go through.

The first and main goal behild this first series of bombing is to kick the Jews, Christians and Infidels from the purified lands of the Arabian peninsula because it is the belief of every Muslim who bears witness that there is no God but one and Mohammed is his messenger. It is one of the last words of our profet said before his soul seperated his body when he said "Kick the Jews and Christians out of the Arabia peninsula. No two religions shall remain on the lands of the Arabian peninsula."

There will be a series of bombings that will follow no matter how many lives of ours are taken or how many bodies are in prison.

That is the precise reason why we chose the building we chose.

A second and non-direct goal is a retaliation because of the recent imprisonment of the leaders of the worldwide Islamic uprising ver a year and an half ago among them are Sheif Salman Al-Odeh and Doctor Safar Al-Hawali, as well as hundreds more with them in prison and thousands more who were fired from their jobs or intimated for calling the people to return to Islam and ask for their fundamental rights.

Anywhere in the world where we see people asking for their fundamental rights getting imprisoned the U.S. is one of the first countries to condemn them but what happeded to our scholars in Saudi Arabia was overcome by their need of Saudi's oil!!!

A third goal is basically a mere lesson for the Saudi regime who over the decades of their oppressing leadership never thought something this bis and this damaging was imaginable let along possible, we'll now we can tell our government it's possible and where that came from there is much...much...more...there will be a detailed official letter we will send out following this one on how the attack was carried out.

Now last but not least a word of advice: 1. Before the attack was carried out we sent several messages by different forms to the officials responsible that we wanted the Americans especially those of the armed forces out of our region but when we heard or saw no response we were left with one choice to



attach them, so maybe now we might be heard (the American's and mainly the American forces must leave our lands immediately, or series of attacks will follow on the civilian Americans because we know security will be stricter on military basis where U.S. officials are stationed and they are easier to attack than the military sites).

2. We demand the immediate release of our great scholars who are imprisoned with no restrictions placed upon them.

3. This action was not action taken by one or two people. This action was carried by a group of people with the aid of a great majority of a trend of independent people under the command of several scholars who without their permission we would never taken the action as we have done.

4. The next series of actions will include attacks on members of the royal family both in and out of the boundaries of Saudi Arabia.

5. A word of advise to King Fahed, Prince Naif, and Prince Sundar...If you don't want your country to by another Egypt, Algeria or France straighten your act up.

Leader of the Islamic movement for change. Abu-Baker.

This letter was sent exclusively to CNN so that it may be heard throughout the world...we ask that we be heard through CNN because it's one of the only ways for it to be heard in the Arabian peninsula. If you are waiting for the government to declare that the Islamic Movement responsible they will never do that, if it was possible for them to keep it a secret they would of but unfortunately for them this time they should not."

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CRIMINAL NO. 03-80810

**Plaintiff,**

HONORABLE GERALD E. ROSEN

V.

D-1 AHMAD MUSA JEBRIL,  
D-2 MUSA ABDALLAH JEBRIL.

**Defendants.**

## **CERTIFICATE OF SERVICE**

U.S. DISCHARGE  
U.S. EAST COAST  
DETROIT 1955

I certify that on the 27th day of April, 2005, I filed the Government's Supplemental Sentencing Memorandum with the Clerk of the Court, and hand delivered copies to the Chambers of the Honorable Gerald E. Rosen, and to Officer Russ Wiedenmeyer, US Probation Department. I also served copies upon counsel for the defendants by placing them in stamped envelopes addressed to:

Stephen T. Rabaut  
19900 East 10 Mile Road  
Saint Clair Shores, Michigan 48080

and James C. Thomas  
535 Griswold Street, Suite 2632  
Detroit, Michigan 48226

and depositing them in the United States Mail.

Stacey Harris  
STACEY HARRIS  
Legal Assistant, United States Attorney's Office